

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**

<b>IN RE:</b>	)	
	)	
<b>MOREHEAD MEMORIAL HOSPITAL,</b>	)	<b>Case No. 17-10775</b>
	)	
<b>Debtor.</b>	)	<b>Chapter 11</b>
	)	

---

**NOTICE OF QUALIFIED BIDDERS**

**PLEASE TAKE NOTICE** in accordance with Section VI. of the *Order (A) Establishing Bid Procedures Related to the Sale of the Debtor's Assets, (B) Scheduling a Hearing to Consider the Proposed Sale and Approving the Form and Manner of the Notice Thereof, (C) Establishing Procedures Related to the Assumption and Assignment of Certain Executory Contracts, Including Notice of Proposed Cure Amounts, and (D) Granting Related Relief* entered September 19, 2017 [Dkt. No. 220] (the "Bidding Procedures"),<sup>1</sup> the Debtor has determined the following parties to have satisfied the Bid Requirements and are "Qualified Bidders" for purposes of the Bidding Procedures:

1. Advanced Home Care, Inc., 4001 Piedmont Parkway, High Point, NC 27265
2. Empower iHCC, Inc., 3901 NW 28<sup>th</sup> Street, 2<sup>nd</sup> Floor, Miami, FL 33142
3. First-Citizens Bank & Trust Company, PO Box 25187, Raleigh, NC 27611
4. Liberty Healthcare Management, Inc., 2334 S. 41<sup>st</sup> Street, Wilmington, NC 28403
5. Moses H. Cone Memorial Hospital Operating Corporation, 1200 North Elm Street, Greensboro, NC 27401-1020
6. Radiant Healthcare Group, 1 Main St., Suite 102, Nyack, New York 10960
7. University of North Carolina Health Care System, 101 Manning Drive, Chapel Hill, NC 27514

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Section VII. of the Bidding Procedures, an Auction will be conducted on **October 30, 2017, commencing at 10:00 a.m. Eastern Time** at the offices of Womble Carlyle Sandridge & Rice, LLP, One West Fourth Street, Eighth Floor, Winston-Salem, North Carolina 27101.

---

<sup>1</sup> Unless otherwise noted, capitalized terms used herein but not defined shall have the meanings ascribed to such terms in the Bidding Procedures.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Section VII. of the Bidding Procedures, only Qualified Bidders may participate in the Auction. The following parties shall be entitled to attend but not participate in the Auction (unless they are also a Qualified Bidder): (i) the Consultation Parties and their respective professionals (including professionals for any member of such Consultation Party), and (ii) any creditor providing written notice to Debtor's counsel of their intention to attend and observe the Auction on or before the Bid Deadline.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Section VII. of the Bidding Procedures, each Subsequent Bid at the Auction shall provide net value to the estate in the minimum amount of \$250,000 (if the Subsequent Bid pertains to substantially all of the Debtor's hospital or skilled nursing facility assets) or \$25,000 (if the Subsequent Bid pertains to some lesser portion of the Debtor's assets) (the "Incremental Overbid").

**PLEASE TAKE FURTHER NOTICE** that the Debtor's determination that the Bid Requirements have been met by any Qualified Bidder for purposes of participation at the Auction does not imply any determination by the Debtor that the aggregate consideration of any Qualified Bid is acceptable or that those assets subject to such Qualified Bid shall ultimately be sold.

Respectfully submitted, this the 25<sup>th</sup> day of October, 2017.

**WALDREP LLP**

/s/ Jennifer B. Lyday

Thomas W. Waldrep, Jr. (NC State Bar No. 11135)

Jennifer B. Lyday (NC Bar No. 39871)

Francisco T. Morales (NC Bar No. 43079)

101 S. Stratford Road, Suite 210

Winston-Salem, NC 27104

Telephone: 336-717-1440

Telefax: 336-717-1340

Email: [notice@waldrep LLP.com](mailto:notice@waldrep LLP.com)

*Attorneys for the Debtor*

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
GREENSBORO DIVISION**

<b>IN RE:</b>	)	
	)	
<b>MOREHEAD MEMORIAL HOSPITAL,</b>	)	<b>Case No. 17-10775</b>
	)	
<b>Debtor.</b>	)	<b>Chapter 11</b>
	)	

---

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing **NOTICE OF QUALIFIED BIDDERS** was filed electronically in accordance with the local rules and was served upon those listed below on the date set forth by electronic mail and overnight mail as indicated:

**Electronic Mail (E-Mail):**

Advanced Home Care, Inc.  
c/o James Hogan  
[Jim.Hogan@advhomecare.org](mailto:Jim.Hogan@advhomecare.org)

Empower iHCC, Inc.  
c/o FMS Lawyer PL  
Frank Smith  
[frank.smith@fmslawyer.com](mailto:frank.smith@fmslawyer.com)

First-Citizens Bank & Trust Company  
c/o Ward and Smith  
Paul Fanning  
[PAF@wardandsmith.com](mailto:PAF@wardandsmith.com)

Liberty Healthcare Management  
c/o Yoel Balter  
[YBalter@libertyhcare.com](mailto:YBalter@libertyhcare.com)

Moses H. Cone Memorial Hospital Operating Corporation  
c/o Smith Moore Leatherwood  
William E. Burton, III  
[Will.Burton@smithmoorelaw.com](mailto:Will.Burton@smithmoorelaw.com)

Radiant Healthcare Group  
c/o Jacob Kohn  
[Jacobkohn10@gmail.com](mailto:Jacobkohn10@gmail.com)

University of North Carolina Healthcare System  
c/o K&L Gates  
Margaret R. Westbrook  
[Margaret.westbrook@klgates.com](mailto:Margaret.westbrook@klgates.com)

**Overnight Delivery:**

Advanced Home Care, Inc.  
4001 Piedmont Parkway  
High Point, NC 27265

Empower iHCC, Inc.  
3901 NW 28<sup>th</sup> Street  
2<sup>nd</sup> Floor  
Miami, FL 33142

First-Citizens Bank & Trust Company  
PO Box 25187  
Raleigh, NC 27611

Liberty Healthcare Management, Inc.  
2334 S. 41<sup>st</sup> Street  
Wilmington, NC 28403

Moses H. Cone Memorial Hospital Operating Corporation  
1200 North Elm Street  
Greensboro, NC 27401-1020

Radiant Healthcare Group  
1 Main St.  
Suite 102  
Nyack, New York 10960

University of North Carolina Health Care System  
101 Manning Drive  
Chapel Hill, NC 27514

Dated: October 25, 2017

**WALDREP LLP**

/s/ Jennifer B. Lyday

Thomas W. Waldrep, Jr. (NC State Bar No. 11135)  
Jennifer B. Lyday (NC Bar No. 39871)  
Francisco T. Morales (NC Bar No. 43079)

101 S. Stratford Road, Suite 210  
Winston-Salem, NC 27104  
Telephone: 336-717-1440  
Telefax: 336-717-1340  
Email: [notice@waldrepllp.com](mailto:notice@waldrepllp.com)

*Attorneys for the Debtor*